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Attorneys for Defendant Sunrun Inc.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

PEGGY BANKS, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

SUNRUN INC.

Defendant.

Case No. 4:24-cv-07877-JST

(Hon. Jon S. Tigar)

**JOINT CASE MANAGEMENT
STATEMENT**

Action Filed: Nov. 11, 2024

1 Counsel for Plaintiff Peggy Banks (“Plaintiff”) and counsel for Defendant Sunrun Inc.
2 (“Sunrun”) hereby respectfully submit this Joint Case Management Statement pursuant to this
3 Court’s Order Continuing Case Management Conference, dated August 21, 2025. Dkt. No. 42.

4 **I. Status of The Parties’ Discovery**

5 **A. Discovery Propounded By Plaintiff**

6 On January 28, 2025, Plaintiff served interrogatories and document requests on Sunrun. On
7 March 13, 2025, Sunrun served its written objections and responses to those requests. Thereafter,
8 beginning on April 3, 2025, Sunrun has made productions of documents responsive to Plaintiff’s
9 discovery requests. Sunrun continues to review its documents for responsiveness and will make
10 future document productions, if any, before the discovery end date. Sunrun and Plaintiff are in the
11 process of meeting and conferring with respect to Sunrun’s discovery responses, and to discuss the
12 perceived deficiencies. Plaintiff intends to depose Sunrun’s 30(b)(6) representative and will work
13 to find a mutually agreeable deposition date.

14 **B. Discovery Propounded By Defendant**

15 On May 2, 2025, Sunrun propounded interrogatories and requests for production of
16 documents on Plaintiff. Plaintiff served her written objections and responses on June 26, 2025. On
17 November 4, 2025, Plaintiff produced certain documents in response to Sunrun’s discovery
18 requests. Sunrun and Plaintiff are in the process of meeting and conferring with respect to Plaintiff’s
19 discovery responses, and to discuss the perceived deficiencies. Sunrun intends to depose Plaintiff
20 and will work to find a mutually agreeable deposition date.

21 **II. Other Issues Requiring This Court’s Attention**

22 On November 14, 2025, the parties submitted a stipulation and proposed order requesting a
23 60-day extension of current case deadlines to align with the extension request in the *Strickland v.*
24 *Sunrun* matter pending before this Court. Sunrun may file a motion to compel if the Parties cannot
25 come to a resolution with respect to Plaintiff’s discovery responses.

1
2 Dated: November 14, 2025

Respectfully submitted,

3 /s/ Glenn T. Graham

4 Glenn T. Graham (SBN # 338995)
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Attorneys for Plaintiff Peggy Banks

25
26 **ATTESTATION**

27 I, Glenn T. Graham, am the ECF user whose identification and password are being used to
28 file this document. I hereby attest that all other signatories listed and on whose behalf the filing is
submitted, concur in the filing's content and have authorized the filing.

Dated: November 14, 2025

/s/ Glenn T. Graham

Glenn T. Graham